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**VIA ECF & EMAIL:** [sullivanysdchambers@nysd.uscourts.gov](mailto:sullivanysdchambers@nysd.uscourts.gov)

Hon. Richard J. Sullivan  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2104  
New York, New York 10007

**Re: *Akilah Hughes v. Carl Benjamin a/k/a "Sargon of Akkad, et al.,*  
17-cv-06493 (RJS)**

Dear Judge Sullivan:

This firm represents Plaintiff Akilah Hughes ("Plaintiff"). Defendant Carl Benjamin ("Defendant") is represented by Wesley M. Mullen of Mullen P.C. This letter is in reply to Defendant's Letter Response to Plaintiff's Letter Motion to Expedite Service Via Email on Defendant and is consistent with this Court's Memo Endorsement on the same [Dkt. #14, #15].

Defendant forced Plaintiff to make her motion for substituted service (the "Motion") by refusing to provide a valid address for service (Defendant previously provided a false address in a sworn declaration) and by refusing to allow his counsel to accept service on his behalf. Now, in response to the Motion, Defendant suddenly consents to waive service without any explanation for the unnecessary delay. Despite Defendant and his counsel's full knowledge that Plaintiff was going to make her Motion, they decided to waste Plaintiff's and this Court's time and resources.

That said, in the interest of moving this litigation forward and avoiding any further delay, and pursuant to Defendant's consent, we shall direct a request for waiver of service pursuant to Federal Rule of Civil Procedure 4(d) to Defendant's counsel for execution.

Thank you for your time and consideration.

Respectfully Submitted,

**MORRISON & LEE LLP**

By:   
Michael Lee (WL 6353)